



RECEIVED
SEP 2 1993
FCC - MAIL ROOM

8/31/93

Federal Communications Commission
William Caton
Acting Secretary
1919 M. St., N.W.
Washington, D.C. 20554

Re: MM Docket No. 93-171
RM-8257 (Lindsborg and Sterling, Kansas)

Dear Mr. Catton:

Enclosed, on behalf of JD Communications, owner of KQNS-FM, 95.9, Lindsborg, is a second copy of our filing concerning the above reference proceeding filed May 10, 1993. We are still very much interested in the proceeding and respectfully request that our continued interest filing be accepted on a late file basis.

Very truly yours,

E. Jerry Davies
* P.O. Box 1069
McPherson, Kansas 67460

No. of Copies rec'd
List A B C D E

043

RECEIVED
SEP 2 1993
FCC - MAIL ROOM

E. JERRY AND DIANE DAVIES
KQNS(FM)

PETITION TO AMMEND THE FM TABLE OF ALLOTMENTS

UP-GRADING THE ALLOTMENT FOR LINDSBORG, KANSAS

TO CLASS C3 OPERATION ON CHANNEL #238

MAY 10, 1993

TABLE OF CONTENTS

ENGINEERING STATEMENT

EXHIBIT #1	LINDSBORG, KS. CH.#238C3 SPACING STUDY
EXHIBIT #2	STERLING, KS. CH.#234A SPACING STUDY

LARRY P. WAGGONER
Broadcast Technical Consultant

1712 VALLEYVIEW CT. • WICHITA, KS 67212 • (316) 722-3726

May 10, 1993

ENGINEERING STUDY

I, Larry P. Waggoner, have been retained to prepare this Engineering Study in support of E. Jerry and Diane Davies' petition for rule making to amend the FM Table of Allotments, Section 73.202(b) of the FCC Rules, reference the allotment to Lindsborg, Kansas. The change requested is to up-grade Channel #240A to Channel #238C3.

Exhibit #1 is a Class C3 spacing study made from a reference point using the existing KQNS(FM) transmitter site north of the city of Lindsborg. The site will continue to provide signals in excess of city grade over the entire community with no terrain blockage.

Exhibit #1 shows that Channel #238C3 can be assigned to Lindsborg, Kansas and be in compliance with all FCC regulations, with one exception. This proposal is short spaced to an allocation of Channel #239A for Sterling, Kansas.

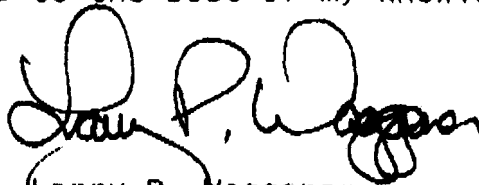
Exhibit #2 shows that Channel #234A can be substituted for Channel #239A in Sterling, Kansas. The spacing study used the Sterling, Kansas Class A allocation reference point (N38°10'56"-W98°14'27"). This reference point is located 4.3 kilometers southwest of the city of Sterling (N38°12'56"-W98°12'24"). Exhibit #2 shows that Channel #234 meets all of the Commission's spacing requirements for Class A operation from the Sterling, Kansas allocation reference point.

The Table of Allotments 72.202(b) would be changed as follows:

Present:	KANSAS	Proposed:	KANSAS
	Lindsborg 240A		Lindsborg 238C3
	Sterling 239A		Sterling 234A

Application for Class C3 operation on KQNS(FM) will be promptly made if this petition is approved by the Commission.

This Engineering Report was prepared by me and all statements are true and accurate to the best of my knowledge and ability.



Larry P. Waggoner
Broadcast Technical Consultant
1712 Valleyview Court
Wichita, Kansas 67212-1245
316-722-3726

05-10-1993

Larry Waggoner

PAGE 1

EXHIBIT #1

FM Study for: KQNSFM

FCC Database Date: 3/93

38-40-00

Location: LINDSBORG, KS

Channel Class: C3

97-41-30

Call City, State

Chan Class Freq kW Latitude Dist.

Required

Status Proponent

File Number HAAT Longitude Azm.

Clear (km)

>>>>>>> Study For Channel 238 95.5 MHz <<<<<<<<

KQNSFM	LINDSBORG, KS	240 A	95.9	1.30	38-40-00	0.0	42	
LIC	SMOKY HILL BROADCASTI	BLH-880429KC	139		97-41-30	0.0	-42.0	SHORT
	Use of 73.215 for short spacing requires:					40	-40.0	SHORT
ALLOC	STERLING, KS	239 A	95.7		38-10-56	72.1	89	
VAC		Docket-91-160	0		98-14-27	221.9	-16.9	SHORT
	Use of 73.215 for short spacing requires:					72	+0.1	SHORT
First Come/First Served Allotment								
Effective 10-28-91-Site Restricted								
KCKS	CONCORDIA, KS	237 A	95.3	3.00	39-33-58	99.9	89	
LIC	GENERAL BROADCASTING	BLH-781013AD	49		97-41-04	0.4	+10.9	CLOSE
KICTFM	WICHITA, KS	236 C1	95.1	100.	37-47-58	97.3	76	
LIC	GRANITE BROADCASTING	BLH-821217AK	274		97-31-58	171.7	+21.3	CLEAR
KSKU	LYONS, KS	291 C1	106.1	100.	38-15-47	48.4	24	
LIC	AD ASTRA PER ASPERA B	BLH-890914KD	200		97-54-08	202.4	+24.4	CLEAR
KHCA	WAMEGO, KS	237 A	95.3	6.0	39-12-35	130.9	89	
LIC	WILDCAT RADIO, INC.	BLH-880425KC	99		96-21-05	62.2	+41.9	CLEAR
KZTO	OTTAWA, KS	239 C1	95.7	97.	38-50-15	191.7	144	
LIC	SHAFFER BROADCASTING	BLH-870511KA	265		95-29-51	83.6	+47.7	CLEAR
KDCK	DODGE CITY, KS	238 C1	95.5	100.	37-38-28	258.9	211	
LIC	DODGE CITY BROADCASTI	BLH-880209KD	176		100-20-40	244.7	+47.9	CLEAR

05-10-1993

Larry Waggoner

PAGE 1

EXHIBIT #2

FM Study for: ALLOC

FCC Database Date: 3/93

38-10-56

Location: STERLING, KS

Channel Class: A

98-14-27

Call City, State

Chan Class Freq kW Latitude Dist.

Required

Status Proponent

File Number HAAT Longitude Azm. Clear (km)

>>>>>> Study For Channel 234 94.7 MHz <<<<<<<

KICTFM WICHITA, KS	236 C1	95.1	100.	37-47-58	75.32	75	
LIC GRANITE BROADCASTING	BLH-821217AK		274	97-31-58	124.1	+0.32	CLOSE
KJCKFM JUNCTION CITY, KS	233 C1	94.5	100.	39-00-53	150.9	133	
LIC JUNCTION CITY BROADCA	BLH-7363		192	96-52-15	51.8	+17.9	CLEAR
ALLOC KINGMAN, KS	232 A	94.3		37-38-48	60.5	31	
VAC	Docket-84-231		0	98-06-54	169.4	+29.5	CLEAR
First Come/First Served Allotment							
# 28							
KXLK HAYSVILLE, KS	287 C	105.3	100.	37-46-40	78.3	29	
LIC MIDCONTINENT BROADCAST	BLH-850823KA		301	97-30-37	124.7	+49.3	CLEAR
ALLOC DOWNS, KS	231 C	94.1		39-31-37	152.0	95	
VAC	Docket-81-629		0	98-34-13	349.3	+57.0	CLEAR
SITE RESTRICTED - EFFECTIVE 6-4-82							
KEBC OKLAHOMA CITY, OK	234 C	94.7	98.	35-32-58	299.6	226	
LIC VAN WAGNER BROADCASTI	BLH-870427KA		423	97-29-50	167.0	+73.6	CLEAR
NEW DOWNS, KS	231 C2	94.1	28.0	39-30-29	147.3	55	
APP HOEFlicker BROADCASTI	BPH-920611MF		89	98-18-57	357.5	+92.3	CLEAR